



**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Brandon L. Fake

**16 3893**

*(In the space above enter the full name(s) of the plaintiff(s).)*

**- against -**

Philadelphia Court of Common Pleas

Judge Kevin M. Dougherty

Judge Margaret T. Murphy

Judge Holly J. Ford

Judge Joel S. Johnson

Judge Robert J. Matthews

Dianne J. Fake

Patrick J. Murphy

Margie M. Murphy

Mary Clark

John Clark, et al. "see attached"

*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No

(check one)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Brandon L. Fake</u>
	Street Address	<u>5341 Bowersox Parkway</u>
	County, City	<u>Weld County, Firestone</u>
	State & Zip Code	<u>Colorado 80504</u>
	Telephone Number	<u>303-506-9910</u>

**Defendants**

Philadelphia Court of Common Pleas  
Judge Kevin M. Dougherty  
Judge Margaret T. Murphy  
Judge Holly J. Ford  
Judge Joel S. Johnson  
Judge Robert J. Matthews  
Dianne J. Fake  
Patrick J. Murphy  
Marge Murphy  
Mary Clark  
John Clark  
Corinna A. Fake  
Daniel Sulman  
Anita N. Botchway  
William Ketterlinus  
Harry Frank  
Allyson Totaro  
Stephen M. Older  
Kevin V. Mincey  
Philadelphia Department of Human Services  
Jessica S. Shapiro  
Gary D. Williams  
Jonathan Houlon  
Margaret Henderson  
Courtney Norella  
Judicial Conduct Board of Pennsylvania  
Judge Robert A. Graci  
Judge Elizabeth S. Beckley  
Judge P. Kevin Brobson  
Judge Christine Fizzano Cannon  
James C. Schwartzman  
Lisa Steindel  
Robert G. Del Greco, Jr.  
Harold E. Flack, II  
Richard T. Frazier  
Philadelphia Police Department 8<sup>th</sup> district  
Officer Marafino #4506  
Officer Kimberly Merry #2051  
Jack Murphy  
Judge Jennifer Harlacher Sibum  
Philadelphia District Attorney's Office  
Lauren Katona  
Maryellen Fields  
Helen Park

Defendant No.5	Judge Joel S. Johnson 1501 Arch Street, Suite 1418 Philadelphia County, Philadelphia Pennsylvania, 19102	
Defendant No.6	Judge Robert J. Matthews 1501 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102	
Defendant No.7	Dianne J. Fake 3319 Ancona Road Philadelphia County, Philadelphia Pennsylvania, 19154	
Defendant No.8	Patrick J. Murphy 204 Mill Street, Unit 403 Bucks County, Bristol Pennsylvania, 19007-4831	101 Army Pentagon Washington D.C. 20310-0101
Defendant No.9	Marge Murphy 204 Mill Street, Unit 403 Bucks County, Bristol Pennsylvania, 19007-4831	113 Clover Lane Lebanon County, Palmyra Pennsylvania, 17078
Defendant No.10	Mary Clark 3614 Nanton Terrace Philadelphia County, Philadelphia Pennsylvania, 19154	
Defendant No.11	John Clark 3614 Nanton Terrace Philadelphia County, Philadelphia Pennsylvania, 19154	
Defendant No.12	Corinna A. Fake 3614 Nanton Terrace Philadelphia County, Philadelphia Pennsylvania, 19154	
Defendant No.13	Daniel Sulman 1501 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102	

Defendant No.14	Anita N. Botchway 1501 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.15	William Ketterlinus 1501 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.16	Harry Frank 1501 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.17	Allyson Totaro 1147 Easton Road Montgomery County, Abington Pennsylvania, 19001
Defendant No.18	Stephen M. Older 1500 JFK Blvd., Suite 1900 Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.19	Kevin V. Mincey 1500 JFK Blvd., Suite 1525 Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.20	Philadelphia Department of Human Services 1515 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.21	Jessica S. Shapiro 1515 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.22	Gary D. Williams 1515 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102

Defendant No.23	Jonathan Houlon 1515 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.24	Margaret Henderson 1515 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.25	Courtney Norella 1515 Arch Street Philadelphia County, Philadelphia Pennsylvania, 19102
Defendant No.26	Judicial Conduct Board of Pennsylvania 601 Commonwealth Avenue, Suite 3500 Dauphin County, Harrisburg Pennsylvania, 17102
Defendant No.27	Judge Robert A. Graci 601 Commonwealth Avenue, Suite 3500 Dauphin County, Harrisburg Pennsylvania, 17102
Defendant No.28	Judge Elizabeth S. Beckley 601 Commonwealth Avenue, Suite 3500 Dauphin County, Harrisburg Pennsylvania, 17102
Defendant No.29	Judge P. Kevin Brobson 601 Commonwealth Avenue, Suite 3500 Dauphin County, Harrisburg Pennsylvania, 17102
Defendant No.30	Judge Christine Fizzano Cannon 601 Commonwealth Avenue, Suite 3500 Dauphin County, Harrisburg Pennsylvania, 17102
Defendant No.31	James C. Schwartzman 601 Commonwealth Avenue, Suite 3500 Dauphin County, Harrisburg Pennsylvania, 17102

- Defendant No.32 Lisa Steindel  
601 Commonwealth Avenue, Suite 3500  
Dauphin County, Harrisburg  
Pennsylvania, 17102
- Defendant No.33 Robert G. Del Greco, Jr.  
601 Commonwealth Avenue, Suite 3500  
Dauphin County, Harrisburg  
Pennsylvania, 17102
- Defendant No.34 Harold E. Flack, II  
601 Commonwealth Avenue, Suite 3500  
Dauphin County, Harrisburg  
Pennsylvania, 17102
- Defendant No.35 Richard T. Frazier  
601 Commonwealth Avenue, Suite 3500  
Dauphin County, Harrisburg  
Pennsylvania, 17102
- Defendant No.36 Philadelphia Police Department 8<sup>th</sup> District  
3100 Red Lion Road  
Philadelphia County, Philadelphia  
Pennsylvania, 19114
- Defendant No.37 Officer Marafino, badge#4506  
3100 Red Lion Road  
Philadelphia County, Philadelphia  
Pennsylvania, 19114
- Defendant No.38 Officer Kimberly Merry, badge#2051  
3100 Red Lion Road  
Philadelphia County, Philadelphia  
Pennsylvania, 19114
- Defendant No.39 Jack Murphy  
113 Clover Lane  
Lebanon County, Palmyra  
Pennsylvania, 17078
- Defendant No.40 Judge Jennifer Harlacher Sibum  
610 Monroe Street, Suite 221  
Monroe County, Stroudsburg  
Pennsylvania, 18360

Defendant No.41 Philadelphia District Attorney's Office  
Three South Penn Square  
Philadelphia County, Philadelphia  
Pennsylvania, 19107

Defendant No.42 Lauren Katona  
Three South Penn Square  
Philadelphia County, Philadelphia  
Pennsylvania, 19107

Defendant No.43 Maryellen Fields  
Three South Penn Square  
Philadelphia County, Philadelphia  
Pennsylvania, 19107

Defendant No.44 Helen Park  
Three South Penn Square  
Philadelphia County, Philadelphia  
Pennsylvania, 19107

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1                      Name Philadelphia Court of Common Pleas  
    Street Address 1501 Arch Street  
    County, City Philadelphia County, Philadelphia  
    State & Zip Code Pennsylvania 19102

Defendant No. 2                      Name Judge Kevin M. Dougherty  
    Street Address 601 Commonwealth Ave. P.O. Box 61260  
    County, City Dauphin County, Harrisburg  
    State & Zip Code Pennsylvania 17106

Defendant No. 3                      Name Judge Margaret T. Murphy  
    Street Address 1501 Arch Street 14th floor  
    County, City Philadelphia County, Philadelphia  
    State & Zip Code Pennsylvania 19102

Defendant No. 4                      Name Judge Holly J. Ford  
    Street Address 1501 Arch Street, Suite 1560  
    County, City Philadelphia County, Philadelphia  
    State & Zip Code Pennsylvania 19102

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)  
☒ Federal Questions Yes              ☒ Diversity of Citizenship Yes

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? 4th Amendment, 6th Amendment, 14th Amendment  
Title 18 of the United States Code, Title 42 of the United States Code 1983  
Title 28 of the United States Code, Title 10 of the United States Code 502



C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship Colorado

Defendant(s) state(s) of citizenship Pennsylvania

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Philadelphia Court of Common Pleas Domestic Relations, Philadelphia, Pennsylvania

B. What date and approximate time did the events giving rise to your claim(s) occur? April 2004- through present date.

C. Facts: The Philadelphia Court of Common Pleas has committed fraud, corruption, obstruction of justice and criminal conspiracy. The initial proceedings in this case were brought forth with malicious intent as well as the fact that Philadelphia Court of Common Pleas was not the proper venue and therefore lacked legal jurisdiction to proceed in this matter. As this case progressed, the level of vexatious and obdurate actions of both Dianne J. Fake and officers of the Court worsened. The Court has violated the Plaintiff's Constitutional Rights on at least nine occasions.

The five Judges listed as Defendants from the Philadelphia Court of Common Pleas have acted criminally as individuals and were influenced to take negative and unprecedented actions towards the Plaintiff. Former Congressman Patrick J. Murphy has used political influence and his position as an officer of the Court to serve out a personal vendetta for his very close and personal friend and neighbor, Dianne J. Fake.

Every individual listed as a Defendant has taken a role in these crimes and atrocities stated in this complaint. Upon discovery and depositions in this matter, there is certain to be more Defendants added to this case.

Plaintiff had legal counsel during some of these proceedings, Attorney Erik J. Conrad, Attorney Lauren H. Kane

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. These actions have caused severe mental anguish and emotional distress to the Plaintiff and members of his immediate family.

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I am praying upon this Court to impose disciplinary sanctions on the appropriate Defendants and award an amount of \$10,000,000.00 to compensate for the twelve years of abuse that the Philadelphia Court of Common Pleas and the listed Defendants have enacted.

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GJP

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

BRANDON L. FAKE,

PLAINTIFF,

V.

CIVIL ACTION NO.

PHILADELPHIA COURT OF  
COMMON PLEAS,  
JUDGE KEVIN M. DOUGHERTY,  
JUDGE MARGARET T. MURPHY,  
JUDGE HOLLY J. FORD,  
JUDGE JOEL S. JOHNSON,  
JUDGE ROBERT J. MATTHEWS,  
DIANNE J. FAKE,  
PATRICK J. MURPHY,  
MARGE MURPHY,  
MARY CLARK,  
JOHN CLARK, ET AL.,

DEFENDANTS,

**COMPLAINT AND JURY DEMAND**

1. The Philadelphia Court of Common Pleas has taken actions outside of it's legal jurisdiction with malicious intent under color of law to violate the Plaintiff's United States Constitutional Rights.

2. Judge Kevin M. Dougherty has violated the rights of the Plaintiff in his official capacity as the Administrative Judge and as an individual by and through his close personal and unethical relationship with Patrick, Marge and Jack Murphy.

3. Judge Margaret T. Murphy has violated the rights of the Plaintiff in her official Capacity as the Supervising Judge, more recently as the Administrative Judge and as an individual by and through her close personal and un-ethical relationship with Murphy's.

4. Judge Holly J. Ford committed Fraud Upon the Court in her official capacity and as an individual by intentionally and knowingly making false statements in official Court documents with the intent of concealing the ongoing crimes that the Philadelphia Court of Common Pleas has committed.

5. Judge Joel S. Johnson has acted under color of law with malicious intent in his official capacity and as an individual, to deprive the Plaintiff of rights that are guaranteed by The 6<sup>th</sup> Amendment of the United States Constitution. Joel S. Johnson has unlawfully imprisoned the Plaintiff.

6. Judge Robert J. Matthews has acted under color of law with malicious intent in his official capacity and as an individual, to deprive the Plaintiff of rights guaranteed by The 6<sup>th</sup> Amendment of the United States Constitution. Robert J. Matthews has made verbal threats and has coerced the Plaintiff.

7. Dianne J. Fake has committed fraud by initiating a fraudulent claim in a court that did not have any legal jurisdiction to hear the case. This action was taken with the malicious intent to defraud the Plaintiff. Dianne Fake had the full knowledge and understanding that the personal and political influence of the Murphy family would assist in her criminal intent.

8. Patrick J. Murphy has committed Fraud Upon the Court by using his political influence and his personal relationships with the aforementioned judges. As an officer of the Court, Patrick J. Murphy has conducted a scheme to “Railroad” the Plaintiff on a track of vexatious and obdurate actions that has corrupted the Administration and Supervision of the Philadelphia Court of Common Pleas. The influence of Patrick J. Murphy continued to affect the decisions and actions of the Court throughout a time that

Mr. Murphy ran for and was elected to the United States Congress. This heinous atrocity was enacted as a personal vendetta for Dianne J. Fake who grew up as his next door neighbor and former romantic partner and they maintain a close personal relationship of over 35 years.

9. Marge Murphy has taken part in this criminal conspiracy by using her personal relationships with other Defendants to interfere with the normal judicial procedure.

10. Mary Clark has taken part in this criminal conspiracy by using her personal relationships with other Defendants to interfere with the normal judicial procedure.

11. John Clark has taken part in this criminal conspiracy by using his personal relationships with other Defendants to interfere with the normal judicial procedure.

12. Corinna A. Fake has taken part in this criminal conspiracy by using her personal relationships with other Defendants to interfere with the normal judicial procedure and has made false statements and reports with malicious intent.

13. Daniel Sulman has committed Fraud Upon the Court as an officer of the Court and as an individual by engaging in unethical behavior and ignoring material evidence in this case.

14. Anita N. Botchway has committed Fraud Upon the Court as an officer of the Court and as an individual by engaging in unethical behavior and ignoring material evidence in this case.

15. William Ketterlinus has committed Fraud Upon the Court as an officer of the Court and as an individual by engaging in unethical behavior and ignoring material evidence in this case.

16. Harry Frank has committed Fraud Upon the Court as an officer of the Court and



as an individual by engaging in unethical behavior and taking actions that have violated the Plaintiff's civil rights.

17. Allyson Totaro has committed Fraud Upon the Court by initiating a fraudulent claim with the full knowledge and understanding that her client, Dianne J. Fake maintains a close personal relationship with Patrick J. Murphy.

18. Stephen M. Older has committed Fraud Upon the Court through his representation of Dianne J. Fake with the full knowledge and understanding of the close relationship that she maintains with the Murphy family.

19. Kevin V. Mincey has committed Fraud Upon the Court through his representation of Dianne J. Fake in her felony case CP-51-CR-0012816-2013, with the full knowledge and understanding that the Murphy family has the ability to make the charges disappear.

20. Philadelphia Department of Human Services has failed to protect the minor children in this case by allowing them to remain in a dangerous and abusive environment with the full knowledge and understanding that adverse actions against Dianne J. Fake would result in political backlash from the Murphy family and their constituents.

21. Jessica S. Shapiro has failed to take appropriate actions to protect the minor children in her official capacity as the Commissioner of the Philadelphia Department of Human Services. Jessica S. Shapiro has acted as an individual with the full knowledge and understanding that Dianne J. Fake has the full support of the politically corrupt machine that the Murphy family controls.

22. Gary D. Williams has failed to take appropriate actions to protect the minor children in his official capacity as the Deputy Commissioner of the Philadelphia Department of Human Services. Gary D. Williams has acted as an individual with the full

knowledge and understanding that Dianne J. Fake has the full support of the politically corrupt machine that the Murphy family controls.

23. Jonathan Houlon has failed to take appropriate actions to protect the minor children in his official capacity as the Chief Deputy City Solicitor. Jonathon Houlon has acted as an individual by conspiring to conceal and destroy records that pertain to the numerous reports of abuse against Dianne J. Fake with the full knowledge and understanding that Dianne J. Fake has the full support of the politically corrupt machine that the Murphy family controls.

24. Margaret Henderson has failed to take appropriate actions to protect the minor children in her official capacity as an investigator and has acted as an individual with the full knowledge and understanding that Dianne J. Fake has the full support of the politically corrupt machine that the Murphy family controls.

25. Courtney Norella has failed to provide documentation regarding the minor children in her official capacity as Deputy City Solicitor. Courtney Norella has acted as an individual by conspiring to conceal and destroy records that pertain to the numerous reports of abuse against Dianne J. Fake with the full knowledge and understanding that Dianne J. Fake has the full support of the politically corrupt machine that the Murphy family controls.

26. Judicial Conduct Board of Pennsylvania has failed to uphold the integrity and the public opinion of the judicial process. The Board has displayed gross negligence by failing to take action in any of the numerous complaints filed and have ignored material evidence that has established the involvement and connections that establish the fact that Defendants in this case have conspired to commit Fraud Upon the Court.

27. Judge Robert A. Graci has failed in his official capacity to properly investigate reports of judicial misconduct. Robert A. Graci has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

28. Judge Elizabeth S. Beckley has failed in her official capacity to properly investigate reports of judicial misconduct. Elizabeth S. Beckley has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

29. Judge P. Kevin Brobson has failed in his official capacity to properly investigate reports of judicial misconduct. P. Kevin Brobson has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

30. Judge Christine Fizzano Cannon has failed in her official capacity to properly investigate reports of judicial misconduct. Christine Fizzano Cannon has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

31. James C. Schwartzman has failed in his official capacity to properly investigate reports of judicial misconduct. James C. Schwartzman has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

32. Lisa Steindel has failed in her official capacity to properly investigate reports of judicial misconduct. Lisa Steindel has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.



33. Robert G. Del Greco, Jr. has failed in his official capacity to properly investigate reports of judicial misconduct. Robert G. DelGreco, Jr. has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

34. Harold E. Flack, II has failed in his official capacity to properly investigate reports of judicial misconduct. Harold E. Flack, II has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

35. Richard T. Frazier has failed in his official capacity to properly investigate reports of judicial misconduct. Richard T. Frazier has acted as an individual with the full knowledge and understanding that political corruption and influence has taken place in the matter.

36. Philadelphia Police Department 8<sup>th</sup> district has failed to take appropriate actions to protect the welfare of minor children and failed to make arrests of Dianne J. Fake and Corinna A. Fake when necessary, due to the full knowledge and understanding that Jack Murphy is a close friend to the perpetrators.

37. Officer Marafino, badge #4506 has failed to protect minor children when they had been victims of abuse and neglect. Marafino has acted outside of his legal jurisdiction by conspiring with Dianne J. Fake in felony interference of a custody order. Marafino has acted as an individual with the full knowledge and understanding of the close relationship with the Murphy's.

38. Officer Kimberly Merry, badge#2051 has failed to protect minor children when they had been victims of abuse and neglect. Officer Merry has blatantly disregarded

material evidence and statements with the full knowledge and understanding of the close relationship with the Murphy's.

39. Jack Murphy has used his influence as a retired sergeant in the 8<sup>th</sup> district to protect his close friends and neighbors. This pattern of corruption dates back to the timeframe when Dianne J. Fake and Patrick J. Murphy were teenagers.

40. Judge Jennifer Harlacher Sibus has failed in her official capacity to protect the welfare of minor children. Jennifer Harlacher Sibus has acted as an individual and a coward when presented with the knowledge of the corruption and fraud that has been committed by Kevin M. Dougherty and the Philadelphia Court of Common Pleas.

41. Philadelphia District Attorney's Office has committed Fraud Upon the Court and has obstructed justice in the Plaintiff's case and criminal case CP-51-CR-0012816-2013. These crimes were committed under color of law with the full knowledge and understanding of Dianne J. Fake's relationship with the Murphy's.

42. Lauren Katona has committed Fraud Upon the Court and has obstructed justice in criminal case CP-51-CR-0012816-2013. These crimes were committed under color of law with the full knowledge and understanding of Dianne J. Fake's relationship with the Murphy's.

43. Maryellen Fields has committed Fraud Upon the Court and has obstructed justice in criminal case CP-51-CR-0012816-2013. These crimes were committed under color of law with the full knowledge and understanding of Dianne J. Fake's relationship with the Murphy's.

44. Helen Park has committed Fraud Upon the Court and has obstructed justice in criminal case CP-51-CR-0012816-2013. These crimes were committed under color of

law with the full knowledge and understanding of Dianne J. Fake's relationship with the Murphy's.

45. April 12, 2004 Allyson Totaro and Stephen M. Older conspire with Dianne J. Fake to commit Fraud Upon the Court by filing for spousal support in an improper venue. At the time of this filing the officers of the Court had the full knowledge that child custody, divorce, and support matters had already commenced in the proper forum in Monroe County, Pennsylvania. This action was filed with malicious intent to deprive the Plaintiff of Constitutional Rights.

46. April 12, 2004 the Philadelphia Court of Common Pleas accepts the above complaint as an inappropriate tribunal without proper venue or legal jurisdiction and failed to forward the complaint to the appropriate tribunal even after being notified verbally and in writing by the Plaintiff. This action was taken with malicious intent to deprive the Plaintiff of Constitutional Rights.

47. March 8, 2005 Daniel Sulman and Anita N. Botchway engaged in an unethical ex parte conversation in which material evidence and guidance of a decision was discussed. The name Murphy was mentioned and slanderous statements were made by Daniel Sulman. The Plaintiff was witness to this entire conversation via teleconference.

48. March 16, 2005 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by seizing personal property under color of law without due process

49. April 17, 2005 the Philadelphia Court of Common Pleas and its officers acted outside of jurisdiction under color of law to commit a false arrest of the Plaintiff.

50. April 17, 2005 officers in the 8<sup>th</sup> district used excessive force during the false arrest while acting under color of law.

51. April 17, 2005 officers in the 8<sup>th</sup> district assaulted and robbed the Plaintiff of \$100

52. August 13, 2005 the Philadelphia Court of Common Pleas and it's officers acted outside of jurisdiction under color of law to conduct an illegal search of the home belonging to the Plaintiff's family in violation of Constitutional Rights.

53. May 9, 2006 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by denying the Plaintiff the right to legal representation and proceeded to imprison the Plaintiff. Judge Joel S. Johnson presided.

54. May 10, 2006 the Philadelphia Court of Common Pleas acting under color of law refused to release the Plaintiff from prison after the established purge amount had been paid in full. Plaintiff was unlawfully imprisoned for over 36 hours.

55. September 18, 2006 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by seizing personal property under color of law without due process.

56. February 21, 2007 Judge Robert J. Matthews engaged in witness intimidation under color of law on the record.

57. April 3, 2007 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by denying the Plaintiff the right to legal representation and proceeded to sentence the Plaintiff to prison. Judge Robert J. Matthews presided.

58. April 3, 2007 Harry Frank as an assistant DA and Dianne J. Fake enter into an unethical relationship in which he became private counsel for Dianne J. Fake when she had an attorney of record and was earning a substantial income as the record will show.

59. October 9, 2007 the Philadelphia Court of Common Pleas under color of law has engaged in witness intimidation and coercion to force the Plaintiff to withdraw an appeal.

60. December 21, 2007 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by seizing personal property under color of law without due process.

61. November 19, 2008 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by seizing personal property under color of law without due process.

62. On or about January 22, 2013 Patrick J. Murphy has obstructed justice by using political influence in the Bucks County felony case of CP-09-CR-0004363-2013 in the allowance of unprecedented courtesies to Corinna Fake who pled guilty to such violent offenses.

63. September 24, 2013 Judge Kevin M. Dougherty commits fraud and obstruction of justice by falsifying documents and records following the felony arrest of Dianne J. Fake, CP-51-CR-0012816-2013. Kevin M. Dougherty docketed Ms. Fake's criminal case using a fictitious birthdate of 09/18/1970. This fraud was intentionally perpetrated to protect Ms. Fake from having her professional license revoked and eliminate the possibility of criminal records searches discovering these charges.

64. On or about September 24, 2013 Patrick J. Murphy obstructed justice as an officer of the Court by using his political influence to conduct a scheme to allow the criminal charges against Dianne J. Fake and Corinna A. Fake to eventually disappear without ever going to trial.

65. September 25, 2013 Judge Kevin M. Dougherty commits fraud by falsifying documents and granted an illegal name change to Dianne N. Fake. This fraud was intentionally perpetrated with malicious intent due to the fact that the criminal case could

not exist on the same record as Dianne J. Fake 09/18/1970 or Dianne J. Fake 09/18/1971, therefore the administrative decision was made to change the domestic relations record to Dianne N. Fake.

66. September 25, 2013 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by seizing personal property under color of law without due process. This order is fraudulent as Dianne N. Fake is a fictional character.

67. March 5, 2014 the Philadelphia Court of Common Pleas commits Fraud Upon the Court by ignoring a filing of contempt from the Plaintiff.

68. December 1, 2014 William Ketterlinus commits Fraud Upon the Court by the issuance of an interim order. This order is fraudulent as Dianne N. Fake is a fictional character.

69. October 2, 2015 Judge Holly J. Ford commits Fraud Upon the Court by filing an opinion in the Superior Court. Holly J. Ford has perjured herself by intentionally and knowingly making false statements in an attempt to conceal the course of illegal, corrupt, vexatious and obdurate actions that she and her fellow officers have taken under color of law.

70. May 16, 2016 the Philadelphia Court of Common Pleas violated the Plaintiff's Constitutional Rights by seizing personal property under color of law without due process . This order is fraudulent as Dianne N. Fake is a fictional character.

71. April 2004- present, the Philadelphia Court of Common Pleas has acted under color of law. Plaintiff incorporates and restates each of the above paragraphs as if fully set forth herein.

72. April 2004- present, the Philadelphia Court of Common Pleas has discriminated



against the Plaintiff on the basis of age, race and gender. Plaintiff incorporates and restates each of the above paragraphs as if fully set forth herein.

73. April 2004- present, the Philadelphia Court of Common Pleas has violated the the Plaintiff's United States Constitutional Rights while acting under the color of law. Plaintiff incorporates and restates each of the above paragraphs as if fully set forth herein.

**WHEREFORE**, Plaintiff respectfully requests that this Court enter judgment against the Defendants providing the following relief:

- a. Compensatory damages in an amount in excess of \$10,000,000.00, excluding costs and interest, that Plaintiff is found to be entitled.
- b. Punitive damages against the Defendants in an amount that the Court deems fair, excluding costs and interest, that Plaintiff is found to be entitled.
- c. An order restraining the Defendants from further acts of discrimination and retaliation.
- d. Criminal charges to be filed against the Defendants that have committed criminal acts.
- e. An award of interest, costs, and reasonable attorney's fees.
- f. Any other action or relief as the Court deems appropriate.

By: Brandon L. Fake  
Brandon L. Fake  
5341 Bowersox Parkway  
Firestone, Colorado 80504  
303-506-9910

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 14th day of July, 2016.

Signature of Plaintiff

Brandon L. Fake

Mailing Address

5341 Bowersox Parkway

Firestone, Colorado 80504

Weld County

Telephone Number

303-506-9910

Fax Number (if you have one)

303-834-9480

E-mail Address

overlook5001@yahoo.com

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

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